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**From:** Klepp, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1857DAFCBCC441888C06A473F38D0D93-BKLEPP]  
**Sent:** 3/14/2019 7:26:21 PM  
**To:** Brooks, Phillip (Brooks.Phillip@epa.gov) [Brooks.Phillip@epa.gov]; Chapman, Apple [chapman.apple@epa.gov]; Fried, Gregory [fried.gregory@epa.gov]  
**CC:** Hoyt, Daniel [Hoyt.Daniel@epa.gov]; Williams, Christopher (Williams.Christopher@epa.gov) [Williams.Christopher@epa.gov]  
**Subject:** RE: Hilcorp Energy Company - FOV and CAA 114 information Request Follow-up

Please disregard the version of the FOV included in the email below. We need to make final edits not seen until now and Phill has to sign the last page of the FOV. Only the cover letter got signed earlier. The signature package is on Phill's chair awaiting FOV signature.

Thanks,  
Bob

**Robert G. Klepp, Attorney**

Office of Civil Enforcement -- Air Enforcement Division  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
(202) 564-5805

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**From:** Klepp, Robert  
**Sent:** Thursday, March 14, 2019 2:55 PM  
**To:** Brooks, Phillip (Brooks.Phillip@epa.gov) <Brooks.Phillip@epa.gov>; Chapman, Apple <chapman.apple@epa.gov>; Fried, Gregory <fried.gregory@epa.gov>  
**Cc:** Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Williams, Christopher (Williams.Christopher@epa.gov) <Williams.Christopher@epa.gov>  
**Subject:** FW: Hilcorp Energy Company - FOV and CAA 114 information Request Follow-up

Phill, Apple and Greg,

Region 6 gave the green light to issuing the FOV after a phone call between Greg and Steve Thompson. I notified NMED counsel that we are cleared to issue. Counsel for Hilcorp is courtesy copied on the FOV and the information request, see below.

As sent versions of the docs are attached.

Bob

**Robert G. Klepp, Attorney**

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**From:** Klepp, Robert  
**Sent:** Thursday, March 14, 2019 2:48 PM  
**To:** 'Eric P. Waeckerlin' <[EPWaeckerlin@hollandhart.com](mailto:EPWaeckerlin@hollandhart.com)>  
**Subject:** Hilcorp Energy Company - FOV and CAA 114 information Request Follow-up

Eric,

Per my voicemail to you just now. I am courtesy copying you on a finding of violation (FOV) and a follow-up CAA 114 information request. EPA is sending both the FOV and the CAA 144 information request today to Hilcorp via certified mail.

The FOV is with regard to Hilcorp's San Jacinto 6E well. On the basis of facts presented in the Hilcorp CAA 114 response received on January 15, 2019, the EPA has determined that Hilcorp violated the requirement under NSPS Subpart OOOOa to route all separated gas during the well completion phase of natural gas production in compliance with reduced emission provisions, i.e., green completion requirements.

The follow-up 114 request is self-explanatory and follows up on Hilcorp's January 15 responses regarding separator operations during flowback and associated OOOOa regulatory requirements.

I am happy to discuss these matters further at your convenience.  
Bob

**Robert G. Klepp, Attorney**  
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